## REMARKS

### Claims Status

Claims 1-8 are currently pending, with claims 1 and 8 being in independent form. Claims 1 and 4 have been amended. The amendment to claim 4 is to correct a minor typographical error. No new matter has been added. Reconsideration of the application, as herein amended, is respectfully requested.

### Overview of the Office Action

Claims 1-6 stand rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Pub. No. 2002/0085516 ("*Bridgelall*") in view of U.S. Pub. No. 2004/0062262 ("*Venteicher*").

Claim 7 stands rejected under 35 U.S.C. §103(a) as unpatentable over *Bridgelall* and *Venteicher* in view of U.S. Patent No. 6,249,836 ("*Downs*").

Applicants have carefully considered the Examiner's rejections, and the comments provided in support thereof. For the following reasons, applicants respectfully assert that all claims now pending in the present application are patentable over the cited art.

### Patentability of the Independent Claims Under 35 U.S.C. §103(a)

Independent claim 1 has been amended to clarify the salient features of the disclosed invention. Thus, independent claim 1 now recites, *inter alia*, "wherein said system comprises a plurality of dedicated architecture resource managers each configured to simultaneously process, on behalf of the each architecture, requests defined by a process manager of the each architecture for access to a common resource of the multi-APN terminal, the requests being generated as a function of an application activated on said multi-APN terminal, and wherein said each

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architecture resource manager is configured to simultaneously dialogue with a resource administrator of a dedicated architecture manager of the multi-APN terminal to manage the common resource of said multi-APN terminal based on simultaneous operational processing of said plural dedicated architectures of said multi-APN terminal which are each connected to the corresponding one of said plural communications networks". Independent claim 8 recites, *inter alia*, the step of "generating the response, at a resource administrator of a dedicated architecture manager of the multi-APN terminal, after checking said common resource access request against simultaneous common resource access requests from others of the plural dedicated architectures of the multi-APN terminal".

The Examiner (at pg. 3 of the Office Action) has acknowledged that *Bridgelall* fails to disclose "a request for access to a common resource of the multi-APN terminal, the request being generated as a function of an application activated on said multi-APN terminal, and to manage the common resource of said multi-APN terminal based on simultaneous operational processing of said plural dedicated architectures of said multi-APN terminal which are each connected to the corresponding one of said plural communications networks" as recited in independent claim 1, and cites *Venteicher* for these features. The Examiner (at pg. 8 of the Office Action) has also acknowledged that *Venteicher* fails to disclose "a multi-access point name (APN) terminal for a plurality of architectures each dedicated to and connected to a corresponding one of a plurality of communications networks" as recited in independent claim 8, and cites *Bridgelall* for these features.

Applicant disagrees, however, that any combination of *Bridgelall* and *Venteicher* achieves the subject matter of independent claims 1 and 8. According to the Examiner, *Bridgelall* "discloses ... wherein said system comprises a plurality of dedicated architecture

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resource managers each configured to [sic] for processing on behalf of the each architecture (fig. 9 par. 52-53 teaches a microprocessor 916 for processing on behalf of the architecture), and wherein said architecture resource manager is configured to dialogue with a resource administrator of a dedicated architecture manager of the multi-APN terminal (fig. 9 par 52, 53 teaches a microprocessor 916 that communicates with micro-controller 922)". Applicant disagrees.

*Bridgelall* relates to "automatic and seamless vertical roaming between a wireless local area network (WLAN) and a wireless wide area network (WWAN) while maintaining an active voice or streaming data connection: systems". *Bridgelall* (paragraph [0052]; FIG. 9) describes a dual mode Radio 900 which enables a user to seamlessly switch between a WLAN and a WWAN, or vice-versa, while roaming in either network area. Paragraph [0053] of *Bridgelall* simply explains that the WWAN Radio 924 duplicates the WLAN Radio section 902 depicted in FIG. 9. *Bridgelall* thus teaches a system that is configured to provide back-and-forth "hand-offs" between the WLAN and the WWAN without losing a communication connection.

There is no teaching or suggestion in *Bridgelall*, however, of a plurality of dedicated architecture resource managers which are each configured to simultaneously process, on behalf of the each architecture, requests defined by a process manager of the each architecture for access to a common resource of the multi-APN terminal, as recited in now amended independent claim 1. The operational processing that occurs in *Bridgelall* is either on the WLAN Radio section 902 or the WWAN Radio 924 section, but the processing does not occur on both radio sections at the same time – i.e. "simultaneously". That is, *Bridgelall* discloses a system in which each transceiver is arranged and configured to non-overlappingly communicate with a different communications network at different instances of time.

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Moreover, *Bridgelall* fails to teach or suggest "wherein said each architecture resource manager is configured to <u>simultaneously</u> dialogue <u>with a resource administrator of a dedicated architecture manager</u> of the multi-APN terminal to manage the common resource of said multi-APN terminal based on simultaneous operational processing of said plural dedicated architectures of said multi-APN terminal", as also recited in now amended independent claim 1.

*Bridgelall* (paragraph [0052]; lines 9-12) explains that "[t]he base band digitization is linked to a Medium Access Controller (MAC) supported by flash memory 918 for message control and connected to a host controller 922 via interface 920". *Bridgelall* (paragraph [0052], lines 12-14) additionally explains that "[t]he host serves as the system master and controls all system level actions required by the Radios". According to *Bridgelall*, the controller 922 manages the flow of <u>control signaling</u> and <u>data traffic</u> between the controller 922 and either the WLAN or WWAN Radio subsystems" (see paragraph [0052], lines 14-17). There is no teaching or suggestion, however, that the controller 922 of *Bridgelall* includes a resource administrator with which each architecture resource manager <u>simultaneously</u> dialogues to manage a common resource based on <u>simultaneous</u> operational processing of a plurality of dedicated architectures. <u>There is no resource administrator</u> in the *Bridgelall* system.

*Bridgelall* merely teaches that "[t]he controller 922 is supported by flash memory 924 and RAM 926 in performing system control of the Radios. The controller 922 connects to external peripherals 944, e.g. printer, fax and via an interface 942 to a host, e.g. a laptop or desktop device" (see paragraph [0052], lines 17-21). *Bridgelall* <u>fails</u> to teach or suggest the resource administrator of independent claim 1. Without such an express teaching of the resource administrator recited in now-amended independent claim 1, it thus follows that *Bridgelall* <u>fails</u> to teach or suggest the step of "generating the response, at a <u>resource administrator</u> of a dedicated

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architecture manager of the multi-APN terminal, after checking said common resource access request against simultaneous common resource access requests from others of the plural dedicated architectures of the multi-APN terminal," as recited in independent claim 8.

*Venteicher* similarly lacks an architecture resource manager that is configured to simultaneously dialogue with a resource administrator of a dedicated architecture manager of the multi-APN terminal to manage the common resource of the multi-APN terminal based on simultaneous operational processing of the plural dedicated architectures of the multi-APN terminal which are each connected to the corresponding one of the plural communications networks, as recited in now amended independent claim 1; the resource administrator of independent claim 1 is <u>entirely absent</u> from the *Venteicher* system. Moreover, without such a resource administrator of the dedicated architecture manager of a multi-APN terminal, it is not possible in *Venteicher* to perform the generating step of independent claim 8, wherein after checking the common resource access request against simultaneous common resource access requests from others of the plural dedicated architectures of the multi-APN terminal, a response is generated at the resource administrator of the dedicated architecture manger.

The claimed invention is directed to managing a common resource in a <u>single</u> multi-APN terminal when the terminal is connected through multiple architectures to multiple corresponding communications networks. The management of resources must be performed in a manner which accounts for the dedicated architecture manager (13) that is used to manage each of the dedicated architectures (15, 15'). As explained at pg. 11, lines 11-15 of applicants' specification as originally filed, "[m]anagement by the dedicated architecture manager 13 of the various dedicated architectures 15, 15' each associated with a different communications network enables operation of the terminal 10 as a 'multi-APN' terminal". The claimed invention is thus directed

to enabling the functionality of a <u>single</u> multi-APN terminal when it is connected to a <u>plurality</u> of communications networks. *Bridgelall* in combination with *Venteicher* <u>fails</u> to achieve such a terminal.

As additionally explained at pg. 2, line 24 to pg. 3, line 6 of the instant specification, the dedicated architecture manager in the single multi-APN terminal assigns <u>each</u> dedicated architecture to a corresponding communications network. "The autonomy and independent operation of the dedicated architectures of the terminal guarantee <u>mutual confidentiality and security</u> between the communications networks by providing a 'seal' between the various services connected to the terminal.... To maintain the independence of the various communications networks effectively, and because of the autonomy of the various dedicated architectures of a terminal, each dedicated architecture has no view of the operation of the other dedicated architectures of the terminal" (see, e.g., pg. 2, line 17 to pg. 3, line 13 of the specification). A key aspect of the claimed invention is based on the premise that each dedicated architecture within the <u>single</u> multi-APN terminal is provided with <u>no view</u> of the operation of the other dedicated architectures within the same terminal to thereby maintain the independence of the <u>plurality of communications networks</u>. The sharing of <u>datalink resources</u> would compromise the "seal" guaranteed by the autonomous and independent operation of the dedicated architectures of the terminal such that the desired <u>mutual confidentiality and security</u> between the communications networks would be lost. The combination of *Bridgelall* and *Venteicher* <u>fails</u> to achieve a system that would encompass these advantageous features.

*Venteicher* teaches a system and method in which requests for resources associated with data links are shared among multiple devices operating in the <u>same</u> network. There is simply no teaching or suggestion within *Venteicher* of a <u>plurality of dedicated architecture resource</u>

managers that are each configured to simultaneously dialogue with a resource administrator of a dedicated architecture manager to manage common resources in a single multi-APN terminal based on simultaneous, operational processing of the multiple dedicated architectures of the single multi-APN terminal that are each connected to a corresponding one of the plurality of communications networks, as recited in independent claim 1. Accordingly, *Venteicher* fails to teach or suggest the step of "generating the response, at a resource administrator of a dedicated architecture manager of the multi-APN terminal, after checking said common resource access request against simultaneous common resource access requests from others of the plural dedicated architectures of the multi-APN terminal" as recited in the method of independent claim 8.

The resource administrator of the plural dedicated architecture resource managers that each manage the resources allocated to a respective one of the plural dedicated architectures (15, 15') is described at pg. 11, line 16 to pg. 13, line 5 of the specification as originally filed. The resource administrator dialogs with the plural dedicated architecture resource managers to advantageously manage access to a common resource in a single multi-APN terminal based on simultaneous operational processing of the plural dedicated architectures of the single multi-APN terminal. The combination of *Bridgelall* and *Venteicher* fails to teach or suggest this claimed feature.

The devices of *Venteicher* are controlled in association with a single communications network. There is no attempt in the *Venteicher* system to ensure that the devices do not communicate with each other in this single network to thereby maintain a high level of security. *Bridgelall* discloses a system in which each transceiver is arranged and configured to non-overlappingly communicate with a different communications network at different instances

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of time. The combination of *Bridgelall* and *Venteicher* <u>fails</u> to teach or suggest applicant's claimed invention.

By virtue of the above-discussed differences between the recitations of independent claims 1 and 8 and the teachings of *Bridgelall* in combination with *Venteicher*, and the lack of any clear motivation for modifying the reference teachings to achieve applicant's claimed invention, independent claims 1 and 8 are deemed to be patentable over the combination of *Bridgelall* and *Venteicher* under 35 U.S.C. §103.


**<u>Patentability of Dependent Claim 7 under 35 U.S.C. §103(a)</u>**

The Examiner (at pg. 9 of the Office Action) has acknowledged that the combination of *Bridgelall* and *Venteicher* fails to disclose "wherein each of said plural dedicated architecture resource managers includes a resource correspondence table for defining the resource corresponding to the application activated on said multi-APN terminal," as recited in dependent claim 7, and cites *Downs* for this feature.

Applicants disagree, however, that any combination of *Bridgelall*, *Venteicher* and/or *Downs* achieves the subject matter of dependent claim 7. There is nothing in *Downs* to cure the above-noted deficiencies in *Bridgelall* and *Venteicher* concerning the lack of teachings of, *inter alia*, the claim 1 recited architecture resource manager that is configured to dialogue with a resource administrator of a dedicated architecture manager of a multi-APN terminal.

The combination of *Bridgelall*, *Venteicher* and/or *Downs* therefore <u>fails</u> to teach or suggest the features recited in independent claim 1, let alone in dependent claim 7. Dependent claim 7 is accordingly likewise deemed to be patentable over the combination of *Bridgelall*, *Venteicher* and/or *Downs*.

## Dependent Claims

In view of the patentability of independent claim 1 for the reasons presented above, each of dependent claims 2-7 is respectfully deemed to be patentable therewith over the prior art. Moreover, each of these dependent claims includes features which serve to still further distinguish the claimed invention over the applied art.

## Conclusion

Based on all of the above, applicants submit that the present application is now in full and proper condition for allowance. Prompt and favorable action to this effect, and early passage of the application to issue, are once more solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned to facilitate an early resolution of any outstanding issues.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,
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